



August 26, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: United States Cellular Corporation

Re: PS Docket No 15-91 – Improving Wireless Emergency Alerts and Community-Initiated Alerting

Dear Ms. Dortch:

In accordance with Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, we hereby provide you with notice of an oral ex parte presentation in connection with the above-captioned proceedings. On August 24, 2016, Jeff Baenke, Bill Tortoriello, Alex Mesin and the undersigned spoke by phone with James Wiley, Rasoul Safavian and Michael Connelly of the FCC.

U.S. Cellular discussed the Commission’s proposals in the docket and provided feedback to the Commission in regard to the following aspects:

Character Length – U.S. Cellular expressed support for the concept of expanding the maximum size of message content to 360 characters but detailed the need for an exemption for all legacy devices that are not “technically capable” of receiving longer character alerts due to physical or operating system constraints (including devices no longer supported for OS updates by OEMs due to end of life status).

Message Alert Classification – U.S. Cellular stressed the need for adoption of new standards by the appropriate standards setting bodies (e.g., 3GPP, ATIS) to allow implementation of any changes adopted by the Commission that would create a new alert category. We also stressed the need for an exemption for legacy devices (see discussion

above regarding Character Length) and the need for public safety or FEMA to help educate the public about any new alert (sub)category. U.S. Cellular recommends that the proposed rules use an existing alert category to avoid a solution that requires new standards.

Embedded References in Alerts – U.S. Cellular discussed continuing industry concerns regarding the potential for network overloading resulting from the use of embedded URLs (regardless of any content limitations adopted by the Commission) including the potential for “signaling access storms”. It is possible for all customers receiving WEA alerts with imbedded URL’s to access network services at the same time. Regardless of the size of the message, the act of accessing the network has the potential of creating signaling storms that can overwhelm the network at both radio and core network components. This would have a more adverse affect on regional carriers versus nation carriers due to scale. A regional carrier will have a higher proportion of customers impacted by a WEA alert compared to national carriers. Therefore, the impact of a signaling storm would be higher for a regional carrier than a national carrier. Overload protection mechanism at the network component level could be developed and deployed to mitigate this risk. However, these overload protection mechanisms could impair access to the network during emergency situations.

Geotargeting Of Alerts – We expressed support for geotargeting as a concept but highlighted the need for adoption of standards changes by standards setting bodies (e.g., 3GPP, ATIS) and the need for sufficient implementation timeframes following the adoption of revised standards.

Prioritization of Alert Messages on Devices– U.S. Cellular discussed its significant deployment of single radio LTE devices which are not capable of receiving WEA messages for the duration of a CDMA voice call. This means that those devices will be unable to comply with the requirements discussed in the NPRM. As a result the Commission must create an exemption to any rules it adopts to accommodate single radio handsets. The Commission should also allow sufficient time for device manufacturers to update OS platforms on supported devices and should also exempt end of life legacy devices.

Gateway Alert Logging – U.S. Cellular expressed concerns regarding the potential that the Commission would mandate the retention of 36 months worth alert data. This timeframe would impose a significant additional cost burden on carriers. U.S. Cellular believes that three months worth of data is sufficient.

State/ Local WEA Testing – U.S. Cellular agrees with the benefits of allowing alert originators to test localized WEAs to opt-in participants so long as the CMSP’s obligation is limited to disseminating the alert from the Alert Gateway. Only new LTE devices will likely be capable of being configured to receive the test messages to support local WEA testing as legacy devices lack this capability. Modification of existing WEA standards would be necessary to enable the recommended opt-in localized testing approach.

Sincerely,

/S/

Grant B Spellmeyer
Vice President – Federal Affairs & Public Policy

CC: James Wiley
Rasoul Safavian
Michael Connelly